From: Wright, Jeff
To: Gary Moore/R6/USEPA/US@EPA
Cc: Bordelon, David
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions
Date: 12/07/2012 10:31 AM

Gary –

I have spoken with David Miller and Jeff Wormser in Houston (Weston) regarding the Treatability Test for Delta Shipyards. They have had these type test conducted for a number of their private sector projects. Some of the items they brought up include:

1) – Benchscale Treatability tests tend to provide a general idea of the amount of material needed for stabilization. Field treatability test (Pilot studies) are often much more reliable due to the actual environmental influences present on site. This would include the influence of the groundwater table. Would suggest that benchscale tests be conducted and then used as a go-by for on-site field treatability test prior to removal/stabilization activities. Field treatability tests would be conducted by the cleanup contractor or we could use our construction group if that would be convenient. In the past, they've conducted some of these pilot studies for 10-20K, would obviously, depend on the size of the study and amount of binding materials needed. They said it normally only takes 2-3 days to get an idea of the results, and collect samples for confirmation.
2) – There could be a large variance in costs based on the number of mixtures and tests required to achieve the stabilization criteria. In addition, you may want to consider separate tests for each pit as their stabilization characteristics and requirements may be different.
3) – We can request a cost proposal from the lab once we have outlined the specific stabilization/cleanup criteria to be met.
4) - J. Wormser and D. Miller provided a laboratory contact for Treatability Testing I have called them to obtain some info. Left a message and awaiting return call.

Jeff Wright, CHMM
Weston Solutions, Inc.
an employee-owned company
13702 Coursey Blvd.,
Bldg #7, STE A
Baton Rouge, LA 70817
(225) 297-5415 Direct
(225) 278-8406 Cell
Jeff.Wright@westonsolutions.com

From: John Halk [mailto:John.Halk@LA.GOV]
Sent: Tuesday, December 04, 2012 11:15 AM
To: Wright, Jeff
Cc: Moore.Gary@epamail.epa.gov; Todd Thibodeaux
Subject: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

Pit sludge exhibits some metals and PAH contaminants, as expected with hydrocarbon waste from ship/barge cleanout operations. For treatability samples, it is recommended to test reagent blends of fly ash, bed ash, or cement/lime (Cem-Lime)– a mixture of Portland cement and hydrated lime. Cement/lime mixture is probably best choice – it sets quickly, gives good unconfined compressive strength (recommended 8 psi or better), and can be transported to the site and mixed with long arm excavator.

Collect samples from highest COC locations within the pits and be sure to include highest visual oily material, representative of solid/liquid matrix of the sludge.

It is important to note, that the treatability testing is just that, and we are not pre-judging any future actions as to whether to go ahead with removal activities (whether in-situ or off-site), do other stabilization activities, such as strengthening levees. We can later have meetings to discuss any future action.

Also I think it is okay to use the RECAP Industrial Soil Screening Level as a comparison value to EPA RSLs outside the pit areas. Performing a 95 percent UCL on the outside sample locations (exclusive of the pits) may eliminate the arsenic and PAH constituents at RECAP industrial screening levels. The state RECAP standard for Arsenic is 12 ppm, so running a 95UCL may eliminate the samples outside of the pits.

We can afford to be less conservative inside the pits since this material could be treated and solidified. Please feel free to contact Todd or myself to further discuss the site. All in all, the sampling data looks much better than we anticipated.

Thanks,
John Halk, CHMM

(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

********** ATTACHMENT NOT DELIVERED **********